

William L. Gavras, Esq.
LAW OFFICES OF GORMAN & GAVRAS
A Professional Corporation
2nd Floor, J & R Building
208 Route 4
Hagåtña, Guam 96910
Telephone: 472-2302
Facsimile: 472-2342

Attorneys for Defendant
PAULINE CASTRO

FILED
DISTRICT COURT OF GUAM
JUN - 2 2006
MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

CRIM. CASE NO. CR-06-00001-001

Plaintiff,

vs.

OBJECTION TO PRESENTENCE
REPORT

PAULINE CASTRO,

Defendant.

Comes Now Defendant, by and through counsel, and for her objections to the
presentence report states as follows:

1. Defendant objects to paragraph 30 in that it does not provide the Defendant with the additional one level decrease for acceptance of responsibility. The Defendant did notify Fred Black, the AUSA handling this case while Karon Johnson was off island, with notice that Defendant was going to plead guilty well before the Government expended resources preparing for Defendant's trial. There is no factual basis for the Government's refusal to move for an additional one level decrease. Accordingly, Defendants Total Adjusted Offense Level should be 23.

ORIGINAL

2. Defendant anticipates that the hearing on this objection will consume approximately ten minutes of this Court's time.

WHEREFORE Defendant prays that this Court sustain her objection.

Respectfully Submitted,

LAW OFFICES OF GORMAN & GAVRAS

Date: June 1, 2006.

By: 

WILLIAM L. GAVRAS, ESQ.
Attorneys for Defendant
PAULINE CASTRO

CERTIFICATE OF SERVICE

I certify that I will cause to be served upon Karon Johnson, Esq., Office of the U.S. Attorney, and Maria Castro, Office of U.S. Probation, by hand delivery, a true and correct copy of this document on or before June 3, 2006.

Date: June 1, 2006.

By: 

WILLIAM L. GAVRAS, ESQ.
Attorneys for Defendant
PAULINE CASTRO